

Letter to Deputy Administrator Peter Robertson

February 23, 1999
Peter Robertson
Acting Deputy Administrator
U.S. Environmental Protection Agency
401 M Street, SW (1102)
Washington, DC 20460

Dear Mr. Robertson:

The Clean Air Act, 112(r), includes important public information for saving lives, preventing pollution, and protecting property. This information, in compelling Risk Management Plans (RMP), can help people in communities across the country reduce chemical accident hazards. Access to national RMP information on the Internet is important. However, the Internet is just one means of communicating this information. (Indeed, many people don't own computers.) Social justice and public access obligate the U.S. EPA to develop non-computer means for people to learn about and obtain RMP information. This letter suggests ways for EPA to proactively communicate RMP information in public awareness campaigns that help people obtain and use RMP information to reduce hazards.

The Clean Air Act requires some 66,000 facilities to assess their own potential for serious chemical spills, fires, and explosions, and based on these assessments to prepare RMPs. These RMPs include vital information for workers and communities. By law, complete RMPs are public information. 1

(Note: EPA originally estimated that 66,000 sources would be covered by the Risk Management Program. The universe is now estimated to be approximately 36,000 sources because of recent rule changes and judicial and administrative stays. 6/16/1999)

EPA should ensure public access to RMPs in ways that serve both computer able and non-computer publics. Doing so will help develop the agency's own constituencies for chemical hazard prevention programs. A well-organized national database of RMP information provides an efficient basis for diverse means of public access.

We urge EPA to: (1) inventory public constituencies with an interest in chemical hazard information, including groups not traditionally associated with chemical hazard prevention, and develop a proactive communication strategy for each of these constituencies; (2) create diverse public access services and mechanisms for national RMP information, and; (3) produce timely and useful information products.

These public constituencies include:

- (a) educators, researchers, and university hazard reduction centers;
- (b) national and local news media;
- (c) the general public;
- (d) community groups, resource centers, and citizen advisory councils;
- (e) social justice, environmental, and labor organizations;
- (f) facility environmental managers;
- (g) investors, lenders, and insurers;
- (h) physicians networks, health departments, nursing homes, and hospitals;
- (i) emergency responders (police, fire, medical services, LEPCs, etc.);
- (j) school districts and parent-teacher associations;
- (k) planning commissions, zoning boards, and public works departments.

In order to serve these constituencies, EPA must establish specific public access services and mechanisms (beyond the Internet) for complete, national RMP information. EPA should:

- (a) establish a public "800" hot line (multi-lingual);
- (b) dedicate liaisons to conduct analysis, rank hazards, and respond to queries;
- (c) distribute complete RMP information through libraries;
- (d) provide quick-find services for information on specific facilities;
- (e) provide same-day fax, mail, and electronic services for facility RMPs;
- (f) use maps and mapping tools to clearly communicate hazards;
- (g) produce a complete CD-Rom;
- (h) develop links to inherent safety resources;
- (i) notify communities of anticipated changes (RMP updates, permits, etc.);
- (j) evaluate routinely all points of access to RMP information.

Helpful RMP information products include:

- (a) an up to date inventory of RMP facilities;
- (b) "success stories" in reducing worst-case vulnerability zones (by industry);
- (c) comparative analyses to provide context;
- (d) "best in class" facilities for hazard prevention in various industries;
- (e) chemical safety videos;
- (f) analyses of top facility vulnerability zones (county, state, and nationwide);
- (g) a public data release publication;
- (h) a catalogue of relevant documents likely to be kept on-site by facilities.

A strong right-to-know program for RMP information has tremendous potential for hazard reduction. Effective outreach builds EPA's chemical safety constituencies. We encourage EPA to act swiftly in ensuring diverse means of access to complete RMP information.

Sincerely,

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Footnote 1. Clean Air Act, 112(r)(7)(B)(iii) and 114(c) at 61 FR 31728 and 61 FR 31717.

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